

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

Case Number: 25-21966-CIV-BECERRA

GLOBAL IP HOLDINGS, LLC,

Plaintiff,

v.

AYR WELLNESS INC.,

Defendant.

DEFENDANT AYR WELLNESS INC.'S UNOPPOSED MOTION FOR A *NUNC PRO TUNC* EXTENSION OF TIME TO RESPOND TO THE COMPLAINT

Defendant AYR Wellness Inc. ("AYR"), by and through undersigned counsel, respectfully requests that the Court enter an order extending the time for AYR to respond to Plaintiff Global IP Holdings, LLC's Complaint by twenty-one days, *nunc pro tunc*, **to and including Friday, August 1, 2025**. AYR states the following in support of this Unopposed Motion:

On April 29, 2025, Plaintiff filed the Complaint, alleging that AYR infringed upon two patents. (Compl. ¶ 17, ECF No. 1.) AYR was served with the summons and Complaint on June 20, 2025, through its registered agent, Corporate Creations Network, Inc. Unfortunately, because AYR has undergone recent personnel changes and has been in the process of moving its corporate headquarters, AYR did not apprehend until Thursday, July 17, 2025, that service had triggered a July 11, 2025, response deadline. On the same day, AYR retained DLA Piper LLP (US) to appear on its behalf in this Action.

In light of the foregoing, AYR did not respond to the Complaint on July 11, 2025. AYR therefore respectfully requests a twenty-one-day extension to respond to the Complaint, counting

from July 11, 2025. The additional time AYR requests to respond to the Complaint will enable AYR to review the allegations in the Complaint and the various attachments thereto to adequately prepare an appropriate response to the Complaint.

AYR submits that good cause exists to grant the requested extension *nunc pro tunc* because AYR's failure to respond to the Complaint by July 11, 2025, was inadvertent and regrettable. Moreover, this is AYR's first request for an extension of time, the request is not sought for purposes of delay, and the request will not affect any other deadlines as this Action is in its infancy. Further no party would be prejudiced by AYR's request for a *nunc pro tunc* extension, and Plaintiff has indicated that it does not oppose the relief AYR requests herein.

For the foregoing reasons, AYR respectfully requests that this Court enter an order (1) granting this Unopposed Motion, (2) extending the time for AYR to respond to the Complaint by twenty-one days, *nunc pro tunc*, **to and including Friday, August 1, 2025**, and (3) granting any such other relief as this Court deems fair and just.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

Undersigned certifies that on July 17, 2025, counsel for the Parties conferred regarding the relief sought herein via telephone. Plaintiff's counsel advised that Plaintiff does not oppose AYR's request for an extension of time to respond to the Complaint.

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Dated: July 17, 2025

Respectfully submitted,

DLA PIPER LLP (US)

/s/ Ardith Bronson

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*Counsel for Defendant AYR Wellness
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2025, I electronically filed the foregoing document via CM/ECF, which caused a true and correct copy to be served electronically upon all entitled parties.

/s/ Ardith Bronson

Ardith Bronson, Esq.